

## United States District Court

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA  
V.

## CRIMINAL COMPLAINT

Lanysha Monique Alvarez PRINCIPAL United States  
YOB: 1994Case Number:  
M-20-464 -M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 18, 2020 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Bernardo Martinez-Lopez, a citizen and national of Mexico, along with four (4) other undocumented aliens, for a total of five (5), who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Alamo, Texas to the point of arrest near Alamo, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONYI further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:


On February 18, 2020, Border Patrol Agents responded to camera activation south of Alamo, Texas in an area known as Schuster's Road. This area is surrounded by harvest fields and smugglers utilize this area by driving in and out along with field worker type vehicles in order to blend in and avoid being stopped by Border Patrol. Agents had received information that a gold in color vehicle was picking up undocumented aliens in this area.

An agent observed six vehicles driving in tandem drive south on Schuster's Road from military road toward the Rio Grande River. Agent noticed that at the end of the vehicle caravan, there was a gold in color Sorts Utility Vehicle (SUV) speeding up and slowing down. As the vehicles were driving west on the levee road from Schuster's road, the agent was able to see all the vehicles came to a stop for a few seconds. The agent heard several doors close and then saw the vehicles continued driving west and then north on Tower Road. The agent relayed to nearby Agents his observations of the gold in color SUV's suspicious activity.

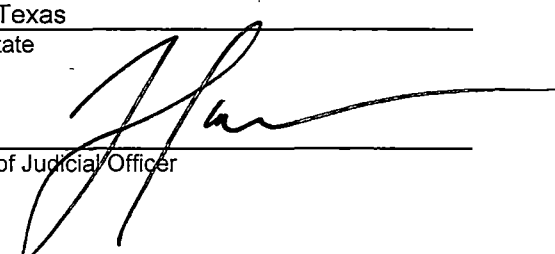
Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Mirna Silva Border Patrol Agent  
Printed Name of ComplainantApproved by AUSA Amy L. Greenbaum  
 2/19/2020February 19, 2020  
Date

C 4:16 PM

at McAllen, Texas  
City and StateJ. Scott Hacker, U. S. Magistrate Judge  
Name and Title of Judicial Officer  
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

M-20-464 -M

**RE: Lanysha Monique Alvarez**

**CONTINUATION:**

A responding agent saw the vehicles exit Tower road and drive west on Dicker road. The agent noticed the gold in color SUV at the end of the vehicle caravan was veering side to side. Based on his observation, the information from the other Agent and prior information matching the same vehicle description picking up aliens, the agent activated his emergency equipment to conduct an Immigration inspection of its occupants. As the agent made contact with a female driver, she voluntarily blurted "Hey Sir, they all jumped inside my vehicle". The female driver was later identified as Alvarez, Lanysha Monique, a United States Citizen. The agent observed one subject on the passenger seat, three subjects on the rear seat, and one subject in the cargo area of the SUV. All five (5) subjects were found to be illegally present in the United States. The driver of the vehicle was transported to the Centralized Processing Center and the other five (5) subjects were transported to the McAllen Border Patrol Station for processing.

**PRINCIPAL STATEMENT:**

Alvarez, Lanysha Monique was read her Miranda rights, she understood her rights and was willing to provide a sworn statement without the presence of an attorney.

Alvarez stated she was hired by a subject who goes by the name of "Milin" to be part of the caravan that was to drive to the area on Tower Road to pick up illegal aliens. Alvarez stated that she was only hired to drive her vehicle to appear as a field worker and that she was not going to pick up aliens. Alvarez stated she was going to get paid \$100.

**MATERIAL WITNESS STATEMENT:**

Martinez-Lopez, Bernardo, a Mexican national was read his Miranda rights, understood his rights and was willing to provide a sworn statement without the presence of an attorney.

Martinez stated that he entered the United States on today's date along with ten other subjects. Martinez stated he was going to pay \$18,000 Mexican pesos for his smuggling into the United States, to which he already paid \$9,000 upfront. Martinez stated that after he made his illegal entry, they were instructed by an unknown person to wait in some brush for some vehicles that were going to pick them up. Martinez stated that several vehicles arrived to where they were concealed and that an unknown male subject waved them toward the SUV and they proceeded to board into the vehicle. Martinez stated the female driver told them that some of them needed to get off because they would be too suspicious and would be stopped by Border Patrol. Martinez stated the rest of the group got off and only five of them left inside the SUV and shortly thereafter they were stopped by Border Patrol. Martinez stated the female driver was on the phone with someone and was speaking English. Martinez stated the female driver appeared to be nervous as Border Patrol was stopping her and he heard her say "What did I get myself into, why did I do this". Martinez stated the female driver instructed them to get off and run but no one wanted to run.

Martinez-Lopez identified Alvarez, Lanysha Monique, through a photo line-up, as the driver of the vehicle who picked them up.